

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

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CAROLYN INGRAM

Plaintiff,

v.

Civil Action No.

HEALTHCARE RECEIVABLES GROUP,  
INC. F/K/A RECEIVABLES MANAGEMENT  
BUREAU, INC.

Defendant.  
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PLAINTIFF, Carolyn Ingram (“Plaintiff”), by and through the undersigned attorney, files this Complaint against DEFENDANT, Healthcare Receivables Group, Inc. fka Receivables Management Bureau, Inc. (“Defendant”), and alleges as follows:

**I. INTRODUCTION**

1. This is an action for damages brought by an individual consumer for Defendant’s violations of the following provisions, resulting from abusive behavior against Plaintiff in the course of Defendant’s attempt to collect a debt:

(1) The Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*  
(hereinafter “FDCPA”).

## **II. JURISDICTION**

2. The FDCPA claim arises under 15 U.S.C. § 1692k(d), and therefore involves a “federal question” pursuant to 28 USC § 1331.

## **III. PARTIES**

3. Plaintiff, Carolyn Ingram (“Plaintiff”), is a natural person residing in Coffee County, Tennessee.
4. Defendant, Healthcare Receivables Group, Inc. fka Receivables Management Bureau, Inc., (“Defendant”) is a corporation engaged in the business of collecting debts by use of the mails and telephone, and Defendant regularly attempts to collect debts alleged to be due another.

## **IV. FACTUAL ALLEGATIONS**

5. Defendant is a “debt collector” as defined by the FDCPA, 15 U.S.C. § 1692a(6).
6. Plaintiff is a “consumer” as defined by the FDCPA, 15 U.S.C. § 1692a(3).
7. All activities of Defendant set out herein were undertaken in connection with the collection of a “debt,” as defined by 15 USC § 1692a(5).
8. Within the last year, Defendant contacted Plaintiff by telephone in an attempt to collect an alleged outstanding debt. During that telephone conversation, Defendant performed the following acts, which amount to violations under various federal and state laws. Communicating or threatening to communicate credit information which is known or which

should be known to be false, including continuing to report Plaintiffs debt to credit reporting agencies without including a note indicating that Plaintiff has disputed such debt.

On or about November 5, 2007, Plaintiff sent Defendant a letter indicating that she disputed the debt that Defendant was attempting to collect. The debt was to Orlando Regional Healthcare. Defendant has continued to report the alleged debt to credit reporting agencies without including a note indicating that Plaintiff has disputed such debt. Defendant last reported the debt in September, 2009 (§ 1692e(8)).

9. To the extent Defendant's actions, detailed above, were carried out by an employee of Defendant, that employee was acting within the scope of his or her employment.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant for the following:

- A. Declaratory judgment that Defendant's conduct violated the FDCPA;
- B. Actual damages pursuant to 15 USC 1692k;
- C. Statutory damages pursuant to 15 U.S.C. § 1692k;
- D. Costs, disbursements and reasonable attorney's fees for all successful claims, and any unsuccessful claims arising out of the same transaction or occurrence as the successful claims, pursuant to 15 U.S.C. § 1692k; and,
- E. For such other and further relief as may be just and proper.

Dated: April 19, 2010

Respectfully submitted,

Carolyn Ingram

By: /s/Craig Ehrlich

Craig Ehrlich

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